

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK /

IN RE: **Brian J Struffolino**

Hearing Date: January 10, 2019
Hearing Time: 11:15 a.m.

Hearing Location: Albany
Chapter 13
Case No 18-10434

Debtor /

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS WITH NOTICE OF
AWARD OF LEGAL FEES TO DEBTOR'S ATTORNEY IF CASE DISMISSED BEFORE
PLAN CONFIRMATION**

PLEASE TAKE NOTICE that **Brian J Struffolino** (the "Debtor"), by and through their undersigned attorney, are responding to the Motion to Dismiss with notice of award of legal fees to debtor's attorney if case dismissed before plan confirmation.

The Motion filed by Trustee states that Mr. Struffolino is \$1125.34 in arrears on his plan payments.

Mr. Struffolino is being placed on a Work Deduction Order. The Order will include payments that are currently in arrears.

We ask that this Motion be adjourned to 01/24/2019 to allow time for the Work Deduction Order to be signed and sent to the Employer..

Dated: January 02, 2019

/s/ Christiaan Van Niekerk /
CHRISTIAAN VAN NIEKERK, ESQ.
Attorney for the Debtor
525 Union St, Ste 102
Schenectady NY 12305